

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

RALPH WARD, )  
                        )  
Plaintiff,         )  
                        )  
v.                    ) No. 3:20-cv-00981  
                        )  
KEVIN REYNOLDS, TERRANCE         ) Judge Richardson  
STUCKEY, and METROPOLITAN         ) Magistrate Judge Holmes  
GOVERNMENT OF NASHVILLE,         )  
DAVIDSON COUNTY,                 ) JURY DEMAND  
                        )  
Defendants.         )

**JOINT MOTION TO STAY OR MODIFY CASE MANAGEMENT ORDER**

The Parties respectfully request that the Court stay all current deadlines or extend the discovery and expert deadlines for the Parties to participate in mediation. In support of this Motion, the Parties state:

1.      Defendant has taken the Plaintiff's deposition and the Plaintiff has deposed 9 fact witnesses and is scheduled to take a tenth fact witness deposition on October 27, as well as a 30(b)(6) deposition on October 26.
2.      The Parties currently have a discovery dispute pending regarding Plaintiff's 30(b)(6) notice. (Joint Motion for Discovery Conference, Doc. No. 57.)
3.      Currently, the discovery deadline is October 28, 2022. The Plaintiff's expert disclosure deadline is November 4, 2022, and Defendant's expert disclosure deadline is November 28, 2022. The deadline to depose experts is January 20, 2023. The dispositive motion deadline is February 10, 2023. Trial is set for August 15, 2023. (Second Modified Case Management Order, Doc. No. 50.)
4.      Recently, the Parties have made significant progress through informal settlement discussions. The Parties agree that now would be an opportune time to formally

mediate. The Parties have spoken over the phone about potential mediators and are reaching out to prospective neutrals to check their schedules and reserve a date.

5. The Parties believe it is in their clients' best interest to put any remaining deadlines on hold to facilitate a good faith negotiation during mediation.

6. The Parties request that the Court enter a stay of current deadlines pending a mediator's report being filed on a date certain. In the alternative, the Parties request the remaining deadlines, including the discovery, expert disclosure, expert deposition, and dispositive motion deadlines, be extended by 60 days, respectively.

Respectfully submitted,

THE DEPARTMENT OF LAW OF THE  
METROPOLITAN GOVERNMENT OF  
NASHVILLE AND DAVIDSON COUNTY  
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*/s/ Mallory Ricci*  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the forgoing has been served via CM/ECF to:

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*Counsel for Plaintiff*

on this 24th day of October, 2022.

/s/ Mallory Ricci \_\_\_\_\_